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Defendant SHAKEY'S PIZZA ASIA
VENTURES, INC. and Third Party Defendants
CINCO CORPORATION, PC INTERNATIONAL
PTE LTD., and SPAVI INTERNATIONAL USA, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California
limited liability company and DOES 1
through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF JOHN J.
SHAEFFER REGARDING
REPORT FROM SPECIAL
MASTER HON. RICHARD
STONE (RET.)**

Complaint Filed: May 31, 2024
Trial Date: TBD

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES, INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a Singapore business entity; SPAVI INTERNATIONAL USA, INC., a California corporation; CINCO CORPORATION, a Philippines corporation; and ROES 1 through 10, inclusive,

Third Party Defendants.

DECLARATION OF JOHN J. SHAEFFER

I, John J. Shaeffer, state and declare as follows:

1. I am an attorney, duly licensed to practice law in the State of California and admitted to practice in the Central District of California. I am a partner of Fox Rothschild LLP, counsel of record for Plaintiff and Counterclaim Defendant Shakey's Pizza Asia Ventures, Inc. and Third Party Defendants Ventures, Inc. and Third Party Defendants Cinco Corporation, PC International PTE Ltd., and SPAVI International USA, Inc. Unless otherwise stated, I make this declaration of my own personal knowledge and could and would so testify if called.

2. Attached as Exhibit 1 is a true and correct copy of an email correspondence from Special Master Hon. Richard Stone (Ret.) providing a status report in response to the Court's order in dkt. 325.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on November 1, 2025 at Los Angeles, California

/s/ John J. Shaeffer

John J. Shaeffer

CERTIFICATE OF SERVICE

The undersigned certifies that on November 1, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on November 1, 2025.

By: /s/ John J. Shaeffer